

# THE LAW OFFICE OF JEFF CHABROWE

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February 24, 2023

Hon. Denise L. Cote  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Request for Modification of Pretrial Scheduling Order: 22-cv-01197-DLC - Schottenstein, M.D. et al v. Lee

Dear Judge Cote,

I am aware our mediation session is currently scheduled for March 8. However, we would like to request a modification to the pretrial scheduling order. The plaintiffs are still currently working through the complicated process of vetting years of internal emails to provide us with appropriate discovery. Though we have not yet received the incoming discovery, we have been informed it will be produced next week. Therefore, both I and plaintiff's counsel have agreed to reschedule the mediation session to a later date.

I also now am on for the March 6 hearing and trial of the 2019 incarcerated defendant murder case of Ahmed Morrison in Kings County; the hearing and trial of the 2019 incarcerated defendant case of Arthur McLaurin and the hearing and trial of the 2020 incarcerated defendant attempted murder case of Louie Rivera which are both scheduled for March 7 in Bronx County; the sentencing of incarcerated defendant Morice Cooper on March 13 in SDNY; the sentencing of incarcerated defendant Kenneth Spearman on March 17 in SDNY; and the sentencing of Christian Martinez on May 4 in the Northern District of Texas.


After consulting the SDNY Mediation Office, we understand a request for modification of the pretrial schedule must be submitted to Your Honor, as the session will not occur until May and the case was referred in December. The case timeline of the Mediation Office is to schedule within 30 days of the mediator assignment and then 30-60 days from then.

Please take into consideration when selecting a date for the mediation session I will be away from April 7 to 14 for my daughters' spring break vacation, as well as from April 26 to May 2, and counsel for Plaintiffs, Mr. Altabet, has informed me that he is scheduled for a week-long in-person hearing before JAMS LA from May 25 through June 2, 2023.

We hereby request modification of the pretrial scheduling order to reschedule mediation for May 8 or thereafter.

Thank you for your time and consideration in this matter.

Respectfully submitted,

  
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